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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al.,

Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No. 3:18-cv-01477-JR

**PLAINTIFFS' OPPOSITION TO
DEFENDANT NIKE, INC.'S MOTION
TO REDACT A THIRD-PARTY NAME
FROM TRANSCRIPT OF DECEMBER
13, 2024, HEARING**

Nike moved the Court for an “order redacting a certain third-party employee name included in the Court’s December 13, 2024, hearing transcript.” ECF No. 581 at p. 1. This individual’s name is contained on pages 28, 31 and in the Index to the transcript. *Id.* at 2.

In support of its motion, Nike relies upon the documents that were filed in support of NIKE’S Motion to Redact Third-Party Employee Names from the Transcript of October 9, 2024 Discovery Hearing. ECF No. 581 at 1, citing to ECF Nos. 548, 549 and 570. Nike refers to the arguments that it advanced with respect to its motion to redact the transcript of the October 9 hearing in support of its motion to redact the transcripts of the December 13 hearing because the same arguments apply to both motions.

Similarly, in this Opposition to Nike’s Motion, Plaintiffs refer the Court to their filings in support of Plaintiffs’ Opposition To Defendant Nike, Inc.’s Motion To Redact Third-Party Names from Transcript of October 9, 2024 Discovery Hearing, ECF Nos. 562 and 563 (“October 9 Opposition”).

In their October 9 Opposition, Plaintiffs argue that Nike’s attempt to redact the transcript of a public hearing is contrary to applicable law and the strong presumption that Court records, such as the transcript of an open hearing, are available to the public. Specifically with respect to the individual whose name Nike seeks to redact in the transcript to the December 13 hearing Plaintiffs describe that it was particularly inappropriate to redact the name because, among other reasons, her actions indicate that she had provided documents to Plaintiffs’ counsel with the knowledge that her name would be publicly disclosed in this civil action. ECF No. 562 at pp. 2, 9-11.

I. CONCLUSION

For the reasons set forth above, Plaintiffs respectfully request the Court to deny Nike’s Motion to redact portions of the Transcript of publicly held hearing on December 13, 2024 and to permit the filing of an unsealed transcript.

Dated: January 7, 2025

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ James Kan

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